

a money judgment.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify:
- (1) each publicly owned company of which is a parent, subsidiary, partner, or affiliate;
 - (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and
 - (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

The Plaintiff is not a publicly owned company

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

The Defendants removed the case to the Charleston Division of the United States District Court for the District of South Carolina pursuant to 28 U.S.C §1332 (a)(1).

- (E) Is this action related in whole or part to any other matter filed in this District, whether civil or criminal? If so, provide:
- (1) a shore caption and the full case number of the related action;
 - (2) an explanation of how the matter are related; and
 - (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard b different judges.

The Plaintiff is not aware of any at this time.

- (F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleadings reflecting the correct identification.

Not applicable.

- (G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

Not applicable.

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Attorney for Plaintiffs

Mt. Pleasant, South Carolina

October 2, 2006

CERTIFICATE OF SERVICE

I, HEREBY CERTIFY, that on this 2nd day of October, 2006 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such to the following:

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s/ Frank M. Cisa

October 2, 2006
Charleston, SC